

JOHN J. HARTFORD/50714
Attorney at Law
1423 Avondale Road
Hillsborough, CA 94010
Tel.: 650/445-9365
Fax: 650/560-6363
Email: johnjhartford@yahoo.com

Attorney for Defendant
AMERICAN TECH.
NETWORK CORP.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CARSON INDUSTRIES INC.,)	NO. C 14-01769 NC
)	
Plaintiff,)	EXPECTED WITNESS TESTIMONY AND
)	PROPOSED TRIAL EXHIBITS THAT
v.)	SUPPORT THE PROPOSITION THAT
AMERICAN TECH. NETWORK CORP. ET)	ATN RETURNED 419 (RATHER THAN
AL,)	327) GOGGLE UNITS TO CARSON
)	
Defendant.)	Date: November 4, 2015
)	Time: 2:00 pm
)	Crtm: D, 15 th Fl., 450 Golden Gate Ave., SF

Defendant AMERICAN TECH. NETWORK CORP. ("ATN") hereby submits its expected witness testimony any proposed trial exhibits that support the proposition that ATN returned 419 (rather than 327) goggle units to Carson, as follows:

Expected witnesses:

1. James Munn, President of ATN, will testify to the procedure followed by ATN, records kept by ATN, and his personal knowledge in regard to product returns to Carson.
2. Marc Vayn, CEO of ATN, may testify to his personal knowledge in regard to product returns to Carson.

Proposed trial exhibits:

Exhibits 1 through 5 to Statement of evidence re number of defective units, net,
returned by Defendant to Plaintiff, on file herein, as part of Docket No. 96 submitted by Defendant
on October 3, 2015, pursuant to a pretrial minute order dated September 30, 2015.

Respectfully submitted,

Dated: November 1, 2015

By: /s/ John J. Hartford
JOHN J. HARTFORD
Attorney for AMERICAN TECH.
NETWORK CORP.